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December 11, 2020

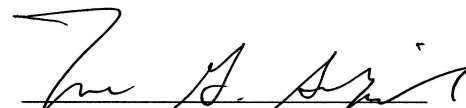
Via ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Ludwig Zelaya Romero
15 Cr. 174 (LGS)

Application Granted. Defendant Romero's sentencing hearing is adjourned from January 20, 2021 to **March 23, 2021**. Defendant Romero shall refile his sentencing submission on or before **March 1, 2021**. The Government shall refile its submission on or before **March 4, 2021**. The Clerk of the Court is directed to terminate the letter motion at docket number 481.

Dated: December 16, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I am the attorney for Ludwig Zelaya Romero, the defendant in the above-referenced matter. This letter is respectfully submitted to request a sixty-day adjournment of Mr. Zelaya Romero's sentencing, which is presently scheduled for January 20, 2021 at 2:00 PM.

The reason for this request is due to the current COVID-19 outbreak at the Metropolitan Detention Center ("MDC"), which is preventing counsel from meeting with or speaking with Mr. Zelaya Romero to review his sentencing memorandum prior to the December 15, 2020 filing deadline. It is my understanding that legal visits at the MDC are currently suspended, and my request for a phone call has been pending for several days due to the high volume of requests for legal calls at this time. I have conferred with AUSA Matthew Laroche, who indicates that the government is trying to work with the MDC to help schedule a phone call for us, and as a result, at this time, it takes no position regarding the instant request. However, given the present circumstances, I do not believe that I will have sufficient time to speak with my client (which requires securing a Spanish interpreter) before Tuesday's deadline. Because it is uncertain when the outbreak will subside, or when legal visiting will resume, I respectfully request to adjourn Mr. Zelaya Romero's sentencing hearing for approximately sixty days.

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If the Court has any questions regarding this application, please contact my office.

Respectfully submitted,

/s/ David Stern

cc: AUSA Matthew Laroche (by ECF)
AUSA Amanda Houle (by ECF)